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August 28, 2012

BY HAND DELIVERY¹

Senior Judge Sterling Johnson, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Deborah Abeel, et al. v. Bank of America, N.A., et al.*
Case No. 12-4269

Dear Judge Johnson:

This firm has been retained to represent the following parties in this action: Bank of America, N.A.; Bank of America Corporation; Countrywide Home Loans, Inc.; Countrywide Alternative Asset Management, Countrywide Alternative Investments; Countrywide Capital I; Countrywide Capital II; Countrywide Capital III; Countrywide Capital IV; Countrywide Capital V; Countrywide Capital VI; Countrywide Capital VII; Countrywide Capital VIII; Countrywide Capital IX; Countrywide Capital Markets Asia (HK) Limited; Countrywide Capital Markets, I.L.C.; Countrywide Commercial JPI I.L.C.; Countrywide Commercial Mortgage Capital, Inc.; Countrywide Commercial Real Estate Finance; Countrywide Hillcrest I; Countrywide International GP Holdings; Countrywide Management Corporation; Countrywide Mortgage Ventures, LLC; Countrywide International Technology Holdings Limited; Countrywide Warehouse Lending; CWABS II, Inc.; CWALT, Inc.; Cyrus Access, Ltd.; Diversified Alpha Fund (Master), Ltd.; Halcyon Access, Ltd.; Indopark Holdings, Ltd.; Investments 2234 Philippines Fund I (SPV-AMC), Inc.; ML Banderia Cayman BRL Inc.; ML Whitby Luxembourg S.A.R.L.; and Zeus Recovery Fund, S.A. (collectively, "Defendants").

This action was removed to this court from the Supreme Court for the State of New York, County of Kings, on Friday, August 24, 2012. Defendants' current deadline to answer, make a motion with respect to, or otherwise respond to the Complaint in this action is Friday, August 31, 2012.

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¹ This letter is being hand delivered because the case has not yet been entered in the ECF System.

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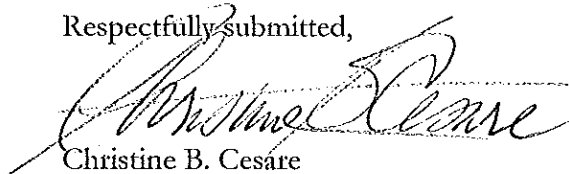
We respectfully request an extension of Defendants' time to respond to the Complaint until October 5, 2012, which is the response date plaintiffs' counsel has agreed to for several other parties in the state court action. This is the first request for an extension.

We have both e-mailed and called Plaintiffs' counsel but have not received a response to our request.

Our review of the docket in the state court action confirms that Plaintiffs previously agreed to an October 5, 2012 response date for the following defendants: Ally Bank, N.A.; Ally Financial, Inc.; Aurora Bank FSB; EMC Mortgage LLC; JP Morgan Chase Bank, N.A. individually and as successor by merger to Chase Home Finance LLC; One West Bank, FSB; PNC Bank National Association; U.S. Bank National Association; Wells Fargo Bank, N.A.; Wachovia Bank and Wells Fargo & Company. Accordingly, Plaintiffs will not be prejudiced and the proceedings will not be delayed by providing Defendants with the same extension of time until October 5, 2012.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Christine B. Cesare", written over a horizontal line.

Christine B. Cesare

cc: Nicholas M. Moccia (Plaintiffs' counsel) (via e-mail)